

[Submitting counsel below]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION**

No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P.  
LUHANA, ESQ. IN SUPPORT OF  
PLAINTIFFS' REPLY IN SUPPORT OF  
MOTION TO COMPEL CUSTODIAL  
DISCOVERY**

This Document Relates to:  
  
All Cases

Judge: Honorable Lisa J. Cisneros  
Date: September 19, 2024  
Time: 11:00 am PT  
Via Zoom

I, Roopal P. Luhana, declare and state as follows:

1. I am an attorney in the law firm of Chaffin Luhana LLP, appointed Co-Lead counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of New York and am admitted pro hac vice to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. I submit this Declaration in support of Plaintiffs' Reply in Support of their Motion to Compel Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's (collectively "Uber") to produce custodial discovery.

3. Exhibit A, attached to Plaintiffs' Reply in Support of their Motion to Compel Discovery, accurately reflects information provided in Uber's March 7, 2024 Rule 26 Disclosures and litigation hold dates provided by Uber on January 16, 2024.

